

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$13,475,175.67 IN FUNDS SEIZED FROM
MITSUBISHI UFJ TRUST AND BANKING
CORPORATION ACCOUNT ENDING IN
0328,

Defendant in Rem.

DELTEC BANK AND TRUST,

Claimant

Civil No. 1:24-cv-2333

VERIFIED CLAIM OF DELTEC BANK AND TRUST LTD.

1. Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Deltec Bank and Trust Ltd. (“Claimant”), by and through its counsel and undersigned representative, hereby files this verified claim and asserts its interest and right in the Defendant Property in rem in this action.

2. Claimant asserts that it has a legitimate, lawful ownership interest in the \$13,475,175.67 that was seized by the United States from its account ending in 0328 at Mitsubishi UFJ Trust and Banking Corporation on June 13, 2023 pursuant to a seizure

warrant issued by a U.S. Magistrate Judge, and that is now subject to Plaintiff's
Complaint for forfeiture *in Rem*.

Respectfully Submitted,

Deltec Bank and Trust Ltd.

/s/ Tatiana Martins
Tatiana Martins (admitted pro hac
vice)
Attorney for Claimant
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CERTIFICATE OF SERVICE

I hereby certify that on the 27 day of January, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of filing (NEF) to the following:

Kevin Hudson
Assistant United States Attorney
Attorney for the United States
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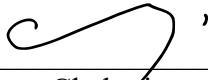
/s/ Tatiana Martins
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VERIFICATION

I, JEAN CHALOPIN, on behalf of Claimant, declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the information contained in the foregoing Claim is true and correct.

Dated: January 23, 2025



Jean Chalopin,
Corporate Representative for Deltec
Bank and Trust Ltd.